

January 21, 2018

Ms. Kim Muratore  
Case Developer (SFD-7-5)  
Environmental Protection Agency, Region 9  
75 Hawthorne St.  
San Francisco, CA. 94105

Re: EPA Section 104 (e) Request Dated December 17, 2018 to Nelco Products, Inc.

Dear Ms. Muratore:

I am General Counsel for AGC America, Inc. and its subsidiaries, which includes Nelco Products, Inc. We have been forwarded a Section 104 (e) Request for Information dated December 17, 2018, which was sent to Park Electrochemical Corp. related to the Orange County North Basin Study Area. Park Electrochemical was the former parent company for Nelco Products, Inc. and received the EPA letter on December 22, 2018. Please note that Park sold Nelco Products, Inc. and other related companies to AGC America, Inc. on December 3, 2018. Therefore, the notice to Nelco Products, Inc. sent to Park was not the correct address nor the correct party to receive the Request for Information for this company. Park no longer owned or controlled Nelco Products, Inc. at the time of receipt of this letter.

We received a copy of this letter from Park on December 28, 2018. Due to the Christmas and New Year holidays, we could not get to work on finding and reviewing information related to this Letter until January 2, 2019. I sent a request for an extension to respond to this letter to you on January 4, 2019, but everyone associated with this case is on furlough due to the government shut down. In an effort to provide some initial information in response to the 104 (e) Request, we are enclosing an initial response to the questions posed to Nelco Products, Inc. We will work to complete the remaining responses within 30 days, though we may need a further extension for some questions due to difficulties in locating previous information.

If you have any questions or wish to discuss this matter further, please let me know. You can call me at 404-446-4208 or e-mail me at [chris.correnti@us.agc.com](mailto:chris.correnti@us.agc.com).

Best regards,



Chris Correnti

General Counsel, AGC America, Inc. and subsidiaries including Nelco Products, Inc.

# EPA Request for Information to Nelco Products, Inc. --

## Initial Responses

The person named below is the person to whom EPA should direct future correspondence regarding this information request.

Christopher Correnti  
General Counsel  
AGC North America including Nelco Products, Inc.  
11175 Cicero Dr., Suite 400  
Alpharetta, GA 30022  
E-mail: [chris.correnti@us.agc.com](mailto:chris.correnti@us.agc.com)  
(404) 446-4208

Nelco Products does not consider any of the information in this response to be confidential.

1. State the full legal name, address, telephone number, email address, and position(s) held by any individual answering any of these questions on behalf of Nelco Products, Inc. and any of its affiliated entities (collectively, the "Company").

RESPONSE 1: The individuals listed below gathered information and provided the answers set forth in this response.

Christopher Correnti  
General Counsel  
AGC North America including Nelco Products, Inc.  
11175 Cicero Dr., Suite 400  
Alpharetta, GA 30022  
E-mail: [chris.correnti@us.agc.com](mailto:chris.correnti@us.agc.com)  
(404) 446-4208

Ron Fleming – Former Director of EHS  
Current EHS Consultant to Nelco Products, Inc.  
2189 S Sailors Way, Gilbert, AZ 85295  
[rfleming@secainc.com](mailto:rfleming@secainc.com)  
(602) 619-5040

2. Identify the dates the Company, under any of its current or former business structures, owned and/or operated the facility located at 1100-1107 E. Kimberly Ave., Anaheim, California (the "Facility"). Additionally, identify the dates that Nelco Products, Inc., the entity that was incorporated in Delaware on May 5, 1965 and was dissolved on February 16, 1972, and New England Laminates Co., Inc. owned and/or operated the Facility.

RESPONSE 2: The Company was incorporated on July 3, 1975 and began operations at the Facility shortly thereafter. The exact date cannot be confirmed to date. A former company called Nelco Products, Inc. ("NPI1") leased and operated at the Facility beginning on April 21, 1965. NPI1 is not related to nor affiliated with the Company. It was a separate legal entity from the Company and was dissolved before the Company was incorporated.

3. Identify the individuals who are or were responsible for environmental matters at the Facility during its operation at this address. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates the individual held such positions.

RESPONSE 3: Company objects to this Question as the relevance and need to identify specific individuals who may have had environmental responsibilities at the Facility is not clearly shown in

this Request. Further, Company has identified the individuals who have contributed to the responses herein in Responses 4 and 5. Subject to these objections, Company is working to identify all the individuals who were responsible for environmental matters at the Facility in the past since July 2, 1975 and may be willing to disclose them on good cause shown. However, we identify the following person for the years 2015 thru 2018:

2015-2018

Ron Fleming – Former Director of EHS  
2189 S Sailors Way, Gilbert, AZ 85295  
[rfleming@secainc.com](mailto:rfleming@secainc.com)  
(602) 619-5040

4. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate. This includes individuals whose job functions included operations that utilized or generated these hazardous substances, or who were responsible for storing/ filling/disposing of hazardous substances and/or wastes containing the above-identified chemicals. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.

RESPONSE 4: Company objects to identifying specific individuals who may have information or knowledge of Company's operations at the facility on the grounds of relevance and lack of authority of EPA to compel this information in response to a Section 104 (e) request for information. Subject to these objections, Company asserts that it never used, stored or disposed of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at, on or under the Facility since its creation on July 3, 1975. We are reviewing records for any information prior to that date, but to the best of the Company's knowledge, information and belief, we are not aware of any such use, storage or disposal at the Facility prior to July 3, 1975. The individuals listed below are familiar with the chemicals used at this facility and were instrumental in determining that these six chemicals were not used at the Facility.

Ron Fleming  
(1983-2000) Various positions  
(2000-2018) Director of Environmental, Health and Safety  
2189 S Sailors Way, Gilbert, AZ 85295  
[rfleming@secainc.com](mailto:rfleming@secainc.com)  
(602) 619-5040

Doug Leys  
(1990-date) Senior Technologist  
1100 E Kimberly Ave, Anaheim, CA 92801  
[dleys@agc-nelco.com](mailto:dleys@agc-nelco.com)  
(714) 459-4466

Marty Kendrick  
(1983-2010) Various Positions  
(2010-date) President, Nelco Products. Inc.  
1100 E Kimberly Ave, Anaheim, CA 92801  
[mkendrick@agc-nelco.com](mailto:mkendrick@agc-nelco.com)  
(714) 459-4465

5. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of the operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below- ground storage tanks. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.

RESPONSE 5: The Company asserts the same objections as set forth in Response 4 and incorporates the same response for this Question 5 as set forth in Response 4.

6. Explain the Company's present corporate status (e.g., active, suspended, defunct, merged, dissolved) as well as its operational status (e.g., whether and where business operations are currently occurring).

RESPONSE 6: The Company is a Delaware corporation and is currently an active corporation authorized to do business in the State of California. The Company currently has assets and some operations at the Facility.

7. Provide the date and in which State the Company was incorporated, formed, or organized.

RESPONSE 7: Company was incorporated in the State of Delaware on July 3, 1975.

8. Describe the corporate relationship (e.g., parent, subsidiary, division, predecessor, successor) between the Company, which was incorporated in Delaware on July 3, 1975, and the following entities: 1) Nelco Products, Inc. which was incorporated in Delaware on May 5, 1965 and was dissolved on February 16, 1972 ("NPI1"); 2) New England Laminates Co., Inc.; and 3) Park Electrochemical Corp.

RESPONSE 8:

1) Company is a separate legal entity from NPI1. There is no corporate relationship between the two companies.

2) To the best of Company's knowledge, information and belief, NPI1 Inc. was dissolved on February 16, 1972 and subsequently operated as a division of New England Laminates Co. Inc. between February 28, 1972 and July 3, 1975.

3) Company was incorporated on July 3, 1975 and took over operations at the Facility from New England Laminates Co.

4) Company's ultimate parent company was Park Electrochemical Corp. until Dec. 3, 2018 and AGC America, Inc. after Dec. 3, 2018.

9. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates, and identify each business structure under which it existed or operated while at the Facility location. For each business structure and name under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure and name. Nelco Products, Inc. which was incorporated in Delaware on May 5, 1965 and was dissolved on February 16, 1972; 2) New England Laminates Co., Inc.; and 3) Park Electrochemical Corp.

RESPONSE 9:

1) Company currently exists as a corporation. It has operated at the Facility from July 3, 1975 until today.

2) To the best of Company's knowledge, information and belief, NPI1 was incorporated in Delaware on May 5, 1965 and was dissolved on February 16, 1972 operated at the Facility from approximately late 1965 or 1966 to February 28, 1972. It operated under the name Nelco Products, Inc.

3) To the best of Company's knowledge, information and belief, the Nelco Products division of New England Laminates Co., Inc. operated at the Facility from February 28, 1972 to July 3, 1975.

- 4) To the best of Company's knowledge, information and belief, Park Electrochemical Corp was the ultimate parent company of Nelco Products, Inc. and New England Laminates Co. but did not operate at the Facility.

10. If the Company operated at the Facility as a subsidiary, division, or other business unit, provide this information and identify where it fits into the larger company's structural organization.

RESPONSE 10: See Response 9.

11. If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and the owners of each fictitious name.

RESPONSE 11: On information and belief, the Company has not operated under any fictitious business name.

12. If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company. To the extent you are aware, include any information regarding changes planned by the buyer regarding operations that involve the use, storage, or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate ( e.g., plans to add or dismantle clarifiers, change the types of solvents being used).

RESPONSE 12: The Company has never owned the Facility or the real estate on which the Facility is located.

13. If the Facility was operated by other parties prior to the Company's operations, identify the prior operators and describe those previous operations to the extent known. Describe any changes made to operations by the Company after it began operating at the Facility that changed (either increases or decreases) the use or disposal of PCE, TCE, 1, 1-DCE, 1, 1, 1-TCA, 1,4-dioxane, or perchlorate.

RESPONSE 13: The Company does not have knowledge or information related to any other prior parties' operations. In addition, the Company never used, stored or disposed of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate since its incorporation on July 3, 1975.

14. For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants and/or lessees.

RESPONSE 14: The Company has never owned the Facility.

15. For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.

RESPONSE 15:

Name: Kimberly Development Co.

Address: 1009 Dolphin Terrace, Corona Del Mar, CA 92625

Phone No: 949-644-9883

16. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any products manufactured or services performed at the Facility. Describe any significant change in Facility size, the Company's number of employees, and the products manufactured or services performed over time.

RESPONSE 16: The Facility consists of two adjacent properties. Each property has a single building. Considered together, both properties total 1.25 acres and the two buildings cover 0.56 of the 1.25 acres. The balance is impervious concrete or asphalt. The Facility once employed as many as 70 people operating over three shifts. The Company has operated there since its incorporation. During this entire time, the Facility has manufactured a material called pre-preg. Pre-preg is sold to customers who use the material to make laminate. Epoxy resin and solvents are mixed to form an epoxy resin solution. The resin solution is applied to fiberglass fabric. Once dry, the fabric is rolled and sold as pre-preg. Since being acquired by AGC America, Inc. on December 3, 2018, all employees of the Company have been transferred to its sister company, Neltec, Inc.

17. Provide a map of the Facility showing the locations of buildings and significant features on the property at the time that the Company operated at the Facility. Indicate the locations of any maintenance shops, machine shops, degreasers, clarifiers, plating areas, painting areas, cooling towers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:

- a. Surface structures (e.g., buildings, tanks, containment areas, storage areas);
- b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers);
- c. Stormwater drainage system and sanitary sewer system, including septic tanks and subsurface disposal fields;
- d. Any-and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Facility or to the property itself (e.g., excavation work) and the dates on which such changes occurred; and
- e. The location of all waste storage or waste accumulation areas as well as waste disposal areas (e.g., dumps, leach fields, burn pits).

RESPONSE 17: Company is reviewing what information is available and will supplement as required.

18. Indicate on a map of the Facility or in narrative form each location where any of the following chemicals were used, stored, generated, spilled, or disposed of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate. Describe any manufacturing or treatment processes in which any of these chemicals were used.

RESPONSE 18: The Company has never used, stored, generated, disposed of or spilled PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate or products containing these chemicals since its incorporation. To the best of Company's knowledge, information and belief, NPI1 and New England Laminates Co. did not use, store or dispose of those materials either.

19. Provide copies, both originals and updates, of hazardous material business plans and chemical inventory forms submitted to city, county, and/or state agencies for the Facility.

RESPONSE 18: Company is reviewing what information is available in response to this Question and will provide any relevant information in a supplemental response.

20. Provide a list of all chemicals and hazardous substances used at the Facility that contained any of the following: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

RESPONSE 20: Company never used, stored or disposed of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate or products containing these chemicals at the Facility. To the best of Company's knowledge, information and belief, no predecessor company did either.

21. For any PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate used at or transported to or from the Facility, identify and provide the following information: a. The trade or brand name, chemical



composition, and quantity used for each chemical or hazardous substance; b. The locations where each chemical or hazardous substance is or was used, stored, and disposed of;

c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;

d. The quantity purchased (in gallons) and the time period during which it was used; and

e. Copies of Material Safety Data Sheets for all hazardous substances used that contain any of these chemicals.

RESPONSE 21: PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate or products containing these chemicals were never used at the Facility by Company. These chemicals were never transported to or from the Facility by Company.

22. Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information related to soil contamination, soil sampling, soil gas sampling, indoor air sampling, geology, groundwater, surface water, and hydrogeology.

a. State whether the information provided represent a complete list of all soil, soil gas, indoor air, and groundwater sampling conducted at the Facility. If you are aware of any other investigations or sampling reports for which the Company does not have a copy, describe the date and type of sampling conducted, and provide information on where EPA might obtain the report and related documents.

b. State whether the Company is aware of any planned future soil, soil gas, indoor air, or groundwater sampling at the Facility, and if so, please describe.

RESPONSE 22: Company is reviewing what information is available and will supplement this response as needed.

23. Identify and provide copies of all agency orders, correspondence, and/or workplans regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was ordered or agreed to be performed, but that was never completed. Explain, to the best of your ability, why the sampling was not conducted.

RESPONSE 23: Company is reviewing what information is available and will supplement as required.

24. Provide copies of any due diligence reports or property transfer assessments related to the Facility.

RESPONSE 24: Company is reviewing what information is available and will supplement as required.

25. Identify, and provide the following information for, all groundwater wells located at the Facility:

- a. A map with the specific locations of the groundwater wells;
- b. Dates of well construction;
- c. Depth to groundwater, depth of well, and depth to and of screened intervals;
- d. Uses of each well;
- e. Date each well was abandoned, if applicable;
- f. Date each well was sampled; g. All constituents analyzed for during groundwater sampling events; and
- h. All groundwater sampling results, reports of findings, and analytical data.

RESPONSE 25: There are no groundwater wells at the Facility.

26. Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits (e.g., national pollutant discharge elimination system [NPDES] permits).

RESPONSE 26: The Company is reviewing what information is available and will supplement as required.

27. For each waste stream generated at the Facility, identify the waste and describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

RESPONSE 27: The Company is reviewing what information is available and will supplement as required.

28. If the Company discharged any of its waste stream at the Facility to the sewer, identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.

RESPONSE 28: To the best of Company's knowledge, information and belief, Company did not discharge any waste to sewer. Because no waste was discharged to sewer, the Facility was never required to obtain a wastewater discharge permit. The only discharge to sewer was from restrooms. No analysis was ever conducted on discharged water.

29. Describe the method(s) used by the Company to remove waste streams from sumps at the Facility.

RESPONSE 29: To the best of Company's knowledge, information and belief, the Facility never had any sumps.

30. Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. Identify and provide supporting documentation of:

- a. The date each release occurred;
- b. The cause of each release;
- c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
- d. Where each release occurred and what areas were impacted by the release; and
- e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.

RESPONSE 30: The Company is determining what information is available and will supplement as required.

31. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

RESPONSE 31: The Company is determining what information is available and will supplement as required.